

1 Steven W. Fogg, WSBA No. 23528  
2 CORR CRONIN LLP  
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9 UNITED STATES DISTRICT COURT  
10 EASTERN DISTRICT OF WASHINGTON

11 NATIONAL SHOOTING SPORTS  
12 FOUNDATION, INC.,

13 Plaintiff,

14 v.

15 ROBERT W. FERGUSON,  
16 ATTORNEY GENERAL OF THE  
17 STATE OF WASHINGTON,

18 Defendant.

No. 2:23-cv-00113-MKD

MOTION FOR LEAVE TO  
APPEAR PRO HAC VICE FOR  
PAUL D. CLEMENT

05/30/2023  
Without Oral Argument

19 I, Steven Fogg, counsel of record for Plaintiff National Shooting Sports  
20 Foundation, Inc., respectfully move the Court for an Order granting admission pro  
21 hac vice to attorney Paul D. Clement to appear in the above-captioned matter as  
22 counsel for Plaintiff pursuant to Local Rule 83.2(c). I am a licensed member in good  
23 standing of the State of Washington bar (WSBA No. 23528) and this Court.

24 Paul D. Clement's qualifications for pro hac admission and other information  
25 required by Local Rule 83.2(c)(3) are set forth below:

MOTION FOR LEAVE TO  
APPEAR PRO HAC VICE- 1

CORR CRONIN LLP  
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A. Applicant's address and phone number:

Paul D. Clement  
 Clement & Murphy, PLLC  
 706 Duke Street  
 Alexandria, VA 22314  
 (202) 742-8900

B. Dates of admission to practice before other courts:

<b>Court</b>	<b>Admission Date</b>
Virginia State Bar	10/06/1994
District of Columbia Bar	05/03/1996
Wisconsin State Bar	05/29/2003
Supreme Court of the United States Bar	01/24/2000
U.S. Court of Appeals for the First Circuit	08/06/2010
U.S. Court of Appeals for the Second Circuit	11/10/2003
U.S. Court of Appeals for the Third Circuit	08/02/2011
U.S. Court of Appeals for the Fourth Circuit	03/30/2000
U.S. Court of Appeals for the Fifth Circuit	09/28/2009
U.S. Court of Appeals for the Sixth Circuit	03/02/2000
U.S. Court of Appeals for the Seventh Circuit	01/09/2000
U.S. Court of Appeals for the Eighth Circuit	09/03/1996
U.S. Court of Appeals for the Ninth Circuit	06/14/2002
U.S. Court of Appeals for the Tenth Circuit	03/22/2000
U.S. Court of Appeals for the Eleventh Circuit	01/27/2009
U.S. Court of Appeals for the District of Columbia Circuit	07/31/1996
U.S. Court of Appeals for the Federal Circuit	04/19/2000
U.S. Court of Federal Claims	11/03/2016
U.S. District Court for the District of Columbia	09/29/2009
U.S. District Court for the Northern District of Florida	05/01/2015

1 C. Name, address, and phone number of admitted counsel with whom the  
2 applicant is associated.

3 Steven Fogg  
4 Corr Cronin LLP  
5 1015 Second Avenue, Floor 10  
6 Seattle, WA 98104-1001  
7 (206) 625-8600

8 D. The necessity for appearance by the applicant.

9 Given his experience and the focus of his practice, Paul D. Clement's  
10 participation in this action would benefit Plaintiff and would assist in ensuring a fair  
11 and efficient resolution of this matter.

12 E. Whether the applicant has any pending disciplinary sanction actions or  
13 has ever been subject to disciplinary sanctions by any court or bar association.

14 Mr. Clement does not have any pending disciplinary sanctions against him,  
15 nor has he ever been subject to any disciplinary sanctions by any court or bar  
16 admission.

17 WHEREFORE, we respectfully request that the Court admit Paul D. Clement  
18 to appear pro hac vice in this action as counsel for Plaintiff National Shooting Sports  
19 Foundation, Inc.

20 DATED this 27th day of April, 2023.

21 CORR CRONIN LLP

22 s/ Steven W. Fogg  
23 Steven W. Fogg, WSBA No. 23528  
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MOTION FOR LEAVE TO  
APPEAR PRO HAC VICE- 3

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1  
2 Paul D. Clement (*pro hac vice forthcoming*)  
3 Erin E. Murphy (*pro hac vice forthcoming*)  
4 Matthew D. Rowen (*pro hac vice forthcoming*)  
5 CLEMENT & MURPHY, PLLC  
6 706 Duke Street  
7 Alexandria, VA 22314  
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*Attorneys for Plaintiff*

MOTION FOR LEAVE TO  
APPEAR PRO HAC VICE- 4

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 27, 2023, I caused to be electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which in turn automatically generated a Notice of Electronic Filing (NEF) to all parties in the case who are registered users of the CM/ECF system. The NEF for the foregoing specifically identifies recipients of electronic notice. I hereby certify that I have also served the foregoing with the complaint on all defendants when accomplishing service of process.

DATED this 27th day April, 2023.

s/ Steven W. Fogg

Steven W. Fogg, WSBA No. 23528

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